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February 6, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication  
Expanding the Economic and Innovation Opportunities  
of Spectrum Through Incentive Auctions,  
GN Docket No. 12-268;  
Broadcast Incentive Auction Comment Public Notice  
Auction 1000, 1001 and 1002  
AU Docket No. 14-252**

Dear Ms. Dortch:

In separate meetings on February 4, 2015, Jack Abernethy, Chief Executive Officer, Fox Television Stations Inc., Brandon Burgess, Chief Executive Officer, ION Media Networks, Inc., John Eck, Executive Vice President, Univision Communications Inc., and Edward P. Lazarus, Executive Vice President, Tribune Media Company (the “Broadcaster Representatives”), and the undersigned met with Chairman Tom Wheeler, Renee Gregory, Legal Advisor to Chairman Wheeler, Gary Epstein, Chair, and Howard Symons, Vice Chair, Incentive Auction Task Force (“IATF”), and William T. Lake, Chief, Media Bureau; Commissioner Mignon Clyburn and Adonis Hoffman, Chief of Staff to Commissioner Clyburn; and Commissioner Ajit Pai and Matthew Berry, Chief of Staff to Commissioner Pai, regarding the referenced proceedings.

The Broadcaster Representatives stated their commitment to work with the Commission and the IATF to help achieve a successful broadcast incentive auction as quickly as possible following adoption of appropriate “rules of the road.” The Broadcaster Representatives proposed three straightforward measures of auction success:

- Motivate robust broadcaster participation.
- Recover as much spectrum as possible.
- Generate maximum forward auction proceeds.

The Broadcaster Representatives noted that collectively their companies own full power and Class A television stations that account for more than 5 billion MHz-pops of broadcast spectrum, including spectrum in markets where demand by wireless broadband networks in the

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incentive auction will be significant. They explained that they are undertaking extensive analysis of the proposals set out in the Commission's December 17, 2014, Auction Comment Public Notice. They also explained that, as established broadcasters with deep ties and abiding commitments to their communities, they assign high value to their existing businesses and operations, and they intend to continue to serve their viewers with the same high level of service following the conclusion of the incentive auction. They noted, therefore, that their evaluation of whether and how to participate in the incentive auction necessarily depends on the adoption of clear and effective rules that maximize the value of the potential opportunity for all broadcasters.

The Broadcaster Representatives observed that the success of the recently-concluded AWS-3 Auction 97 demonstrated that the market rewards simplicity and clarity with respect to both auction participation and value. They commented that these attributes, applied in the context of the broadcast incentive auction, could help increase broadcaster participation and increase the probability of a successful 600 MHz auction.

In this regard, the Broadcaster Representatives explained that they have identified several potential risks to simplicity and clarity, which if left unaddressed could inhibit robust broadcaster participation and, as a result, could impair a successful auction outcome. Thus, they suggested that, in order to enhance broadcaster participation, the Commission:

- State clearly – prior to the deadline for submission of reverse auction applications – a 126 MHz clearing target.
- Provide greater clarity and transparency with respect to reverse auction pricing, including the “dynamic reserve price” concept introduced in the Auction Comment Public Notice.
- Enhance opportunities for channel sharing through greater flexibility, including the ability to enter into channel sharing arrangements following the conclusion of the auction.

The Broadcaster Representatives stated that they are committed to working with the IATF and the Commission to achieve creative solutions to implement these suggestions. They also stated that they are working with other broadcasters to bring about constructive industry engagement on these matters and on auction issues more generally.

This letter is being submitted electronically pursuant to Section 1.1206(b) of the Commission's Rules. Please contact the undersigned if you have any questions about this submission.

Respectfully submitted,

/s/

Mace Rosenstein

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Counsel for Fox Television  
Stations, Inc., ION Media  
Networks, Inc., Tribune  
Media Company and  
Univision Communications  
Inc.

cc: Hon. Tom Wheeler  
Hon. Mignon Clyburn  
Hon. Ajit Pai  
Renee Gregory  
Adonis Hoffman  
Matthew Berry  
Gary Epstein  
Howard Symons  
William T. Lake